BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	98-147
Deployment of Wireline Services	)	CC Docket No. 96-147
Offering Advanced Telecommunications	)	
Capacity	)	

COMMENTS OF CTSI, INC. ON NOTICE OF PROPOSED RULEMAKING

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SUMMARY

The telecommunications industry is experiencing exciting changes as digital technology becomes increasing prevalent. The vast array of advanced telecommunications products that can be provided using digital technology will surely provide Americans with access to more readily available information than ever before. CTSI commends the Commission for its determination to ensure that all Americans have access to these advanced telecommunications products. CTSI believes that the Commission's continued commitment to opening up the markets to competition is the best way to achieve this result.

It is for this reason that CTSI urges the Commission to be cautious in permitting ILECs to set up separate subsidiaries that could be excused from the requirements of Sections 251 and 271 of the Telecommunications Act of 1996. As the proposal is currently written, there are substantial loopholes that could permit an ILEC to favor its affiliate at the expense of CLECs. Therefore, the Commission should adopt safeguards in addition to the ones currently proposed. For example, the Commission should prohibit any marketing and/or advertising with the ILEC and should prohibit the affiliate from using the ILECs' brand name. These provisions should not sunset until after the ILEC is declared non-dominant. Similarly, the Commission should refrain from adopting any *de minimis* exception for transfers of network equipment between the ILEC and affiliate.

If the Commission does adopt a separate affiliate exception, it must supervise the arrangement. Accordingly, the Commission should establish a detailed preapproval process for the affiliate and should monitor the continued compliance with the requirements under the affiliate plan. The Commission should also preempt any state regulation that would permit significant transfers to any affiliate.

To further promote competition in the provision of advanced telecommunications services, the Commission should adopt national collocation standards that would ensure access to collocation at reasonable rates. First, the ILECs should not be permitted to impose unnecessary restrictions on the type of equipment that competing carriers may collocate. Second, the Commission must ensure that ILECs make collocation space available for CLECs. CLECs seeking collocation space should be permitted to tour the ILEC premises when collocation is denied or inappropriate space is offered.

CTSI agrees with the Commission's concern that existing loop unbundling rules do not fully ensure that CLECs have adequate access to the "last mile" of the local loop. Accordingly, the Commission should ensure that the "last mile" is available to all carriers on a nondiscriminatory basis and that loops are priced at reasonable rates. To further this goal, ILECs must be required to provide conditioned loops, free from bridge taps, load coils and midspan repeaters, on request, and must provide sufficient information for the CLEC to determine whether the loop is conditioned. The Commission should also extend loop unbundling requirement to sub-loop elements.

CTSI does not support the Commission's suggestion that it should grant Section 251(c) relief to ILECs that offer advanced services on an integrated basis. Any such grant of relief would inhibit competition. CTSI also agrees with the Commission's tentative conclusion that advanced services must be offered for resale at a wholesale rate discount. Advanced telecommunications services fall within the core category of retail services that both Congress and the Commission anticipated would be available for resale with such discounts.

Finally, CTSI strongly objects to any modification of LATA boundaries that would permit BOCs interLATA entry prior to compliance with § 271 of the 1996 Act. The Commission must not reward the BOCs' anticompetitive behavior by permitting an early entry to the interLATA markets.

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CTSI, Inc. ("CTSI"), through undersigned counsel, hereby respectfully submits its Comments on the Notice of Proposed Rulemaking issued by the Commission in the above-captioned proceeding.[1]

I. INTRODUCTION

CTSI is a competitive local exchange carrier ("CLEC"), currently operating in Pennsylvania and New York providing local exchange services over its own facilities and over Bell Atlantic's ("BA") unbundled loops. CTSI is also certificated to provide local exchange services in Maryland.

In order to compete effectively with the incumbent local exchange carriers ("ILECs" or "incumbents"), CLECs such as CTSI must be able to gain nondiscriminatory access to the incumbents' local networks. Although CTSI agrees with and applauds the Commission's efforts to ensure widespread availability of advanced telecommunications services, CTSI is concerned that permitting incumbents to provide services through "separate" subsidiaries could undermine

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[1] *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, Notice of Proposed Rulemaking, CC Docket No. 98-147, FCC 98-188, released August 7, 1998 ("*Section 706 NPRM*").

competition if the provision is not carefully crafted. Permitting the incumbent to transfer any significant assets to the affiliate or to jointly market with the affiliate could provide the opportunity for anticompetitive behavior.

Moreover, if the Commission genuinely wishes to further competition and the widespread deployment of advanced telecommunications services, the Commission should adopt national standards for collocation and loop unbundling. The Commission should mandate increased collocation options and should ensure that CLECs obtain access to the "last mile" of the local loop.

II. The Commission Should Carefully Craft Any Separate Subsidiary Exception to Ensure that ILECs are not Permitted to Discriminate

While CTSI applauds the Commission's desire to promote the widespread availability of advanced telecommunications services, CTSI is concerned that its separate affiliate proposal could give the ILECs a vehicle for discriminating against CLECs trying to break into the advanced telecommunications market. The proposal contains huge loopholes that could allow an ILEC to favor its affiliate at the expense of CLECs. For instance, the Commission left open the possibility of allowing some joint operation and ownership of transmission facilities and does not prohibit joint marketing and use of brand names. The ability to share in these important assets would not render the subsidiary "separate" in a manner that would promote competition.

A. The Commission Must Ensure Sufficient Safeguards

If the Commission decides to permit ILECs to establish affiliates that would be excused from the requirements of Section 251(c), it must be careful to ensure that the affiliate does not: (1) have control over assets used to provide monopoly telecommunications services; and (2) will not be

afforded favorable treatment in order to gain access to monopoly controlled facilities and equipment. The Commission has proposed seven structural separation and nondiscrimination requirements with which the affiliate would need to comply in order to be excused from Section 251(c) obligations.[2] While CTSI agrees that these seven requirements are a good start in ensuring adequate separation, the list does not go far enough.

First, because the ILEC and the affiliate will be providing service in the same market and thus, to the same customers, complete structural separation is essential.[3] Without the structural separation, there would be nothing to distinguish the affiliate from the ILEC. Therefore, the Commission's first requirement is that the incumbent must "operate independently" from its affiliate.[4] In particular, the incumbent and affiliate may not jointly own switching facilities or the land and buildings on which such facilities are located. CTSI believes that requirement should be expanded to prohibit the joint ownership of *any* facilities. As the proposal is currently written, affiliates might be permitted to share transmission facilities with the ILEC, which would be a significant advantage especially if the sharing arrangement provides that sharing is based on a valuation of the property at depreciated book value, thus passing on substantial cost savings to the affiliate. Because the ILEC and the affiliate will be operating in the same market, any joint

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2 *Section 706 NPRM*, ¶ 96.

3 The structural separation requirements discussed in these Comments should apply only to an ILEC affiliate that offers service in the ILEC's own exchange areas. Operation by an affiliate in exchanges served by a different ILEC does not raise competitive concerns and should not be restricted.

4 *Id.*

ownership of the ILEC's facilities to provide service to customers receiving monopoly service from the ILEC would unduly advantage the affiliate to the detriment of other CLECs.

Moreover, additional safeguards are necessary to help ensure that the affiliate does not receive favorable treatment from the ILEC. Specifically, the Commission should prohibit any joint marketing and/or advertising with the ILEC of local exchange or exchange access services and the affiliate should be required to choose a name that is unambiguously distinct from that of the ILEC and its corporate parent. These two requirements are essential to ensuring increased competition in advanced telecommunications. In the current environment, incumbent LECs still control the local network and dominate the local exchange market. Permitting an affiliate to use the ILEC's brand name and/or jointly market services with the ILEC would allow the affiliate to utilize the incumbent's continuing bottleneck control over the local network, which would plainly violate the policy of Section 251(c). For instance, an advanced services affiliate using the ILEC's brand name and jointly billing for voice traffic and advanced services would appeal to consumers who are already required to use the ILEC for their local service and would prefer advanced services and local services bundled as part of a single package. Similarly, any joint marketing among the ILEC and the affiliate would give customers the impression that the ILEC would be providing the advanced telecommunications services.

In addition to a prohibition of joint marketing and name sharing, the affiliate should not be permitted to share any personnel, Customer Proprietary Network Information ("CPNI") and administrative functions. As the Commission stated, the incumbent and the affiliate should

maintain separate employees, officers and directors. [5] However, the incumbent and affiliate should also not be permitted to share administrative functions. For example, human resources and office administration should not be shared between the two companies. More importantly, the incumbent should be prohibited from sharing CPNI information with the affiliate. Permitting any sharing of CPNI would give the affiliate an undue advantage based on its relationship with the incumbent.

B. The Commission Should Not Adopt a De Minimis Exception

CTSI agrees with the Commission's conclusion that if an ILEC transfers to an affiliated entity ownership of any network elements that must be provided on an unbundled basis or any local loops, the affiliate would be an assign of the ILEC and therefore would be required to comply with Section 251(c).[6] However, CTSI urges the Commission to refrain from adopting any "*de minimis*" exception, which could potentially permit the ILECs to evade the Commission's prohibition. The Commission has proposed allowing a *de minimis* exception for transfers of network equipment, possibly limited to equipment already owned or ordered by the incumbent. The Commission should decide against such an exception.

First, a *de minimis* exception would serve no legitimate purpose. If the Commission has already determined that it would be harmful to permit the ILEC to transfer equipment to its affiliate in the future, there is no reason to make an exception for equipment already purchased. If the incumbent determines that it will provide advanced services through a separate affiliate and that

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5 *Id.*

6 *Section 706 NPRM*, ¶¶ 106-07.

affiliate is to be treated as a CLEC for regulatory purposes, it should not have the advantage of receiving facilities from the incumbent, even of a *de minimis* nature. Moreover, permitting the transfer of already owned equipment to affiliates would not promote the availability of advanced telecommunications services. The purpose of allowing the ILEC to set up a separate affiliate is to encourage investment on the part of the ILEC. As to network facilities already purchased or under order, the ILECs have already made their investment decisions, knowing that the open access obligation under § 251(c) applies. Accordingly, there is no reason for the Commission to deviate from its prior ruling that transfers of any network facilities render that affiliate an incumbent under Section 251(h).

C. The Commission Should Require Prior Approval of Separate Affiliates

CTSI disagrees with the Commission's suggestion that the network disclosure rules might constitute sufficient notification to the industry of transfers to the affiliate.[7] To the contrary, those rules would not provide for appropriate notice because those rules require notification of network functionality changes affecting services or interconnection parameters, and most asset transfers contemplated by the Commission would not inherently involve these network impacts, or could be accomplished without them.

Indeed, if the Commission adopts a separate affiliate plan as suggested in its rulemaking, the Commission should establish a detailed preapproval process for the affiliate.[8] The Commission

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[7] *Section 706 NPRM*, ¶ 115.

[8] In its *Computer II* regulatory regime the Commission established prior approval procedures for provision of enhanced services by separate affiliates of AT&T and GTE. *Amendment*

should require the ILEC to submit a complete plan for establishing the affiliate including proposed asset transfers, marketing plans, and a capitalization plan, with an opportunity for public comment. This approach is necessary to ensure that the ILEC's separate affiliate will not undermine the pro-competitive goals of the Telecommunications Act of 1996.

Moreover, to ensure continued compliance and nondiscriminatory behavior, the Commission's involvement should not end with the formation of the separate subsidiary. If the Commission adopts a separate affiliate proposal, the Commission must not only have a pre-approval process but should monitor the affiliate for continued compliance with the requirements under the affiliate plan. The Commission should also establish enforcement procedures for CLECs to bring complaints against ILECs and affiliates that are violating the rules and must provide for sufficient penalties.

III. The Commission Should Adopt Additional Collocation Requirements

CTSI supports the Commission's proposal to adopt national collocation standards pursuant to Sections 201 and 251 of the Act. Adopting national standards would encourage the deployment of advanced services by increasing predictability and certainty, and would facilitate entry by competitors operating in several states. Although states could supplement the nationwide standard,

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of Section 64.702 of the Commission's Rules and Regulations (Computer II), 77 FCC 2d 384, ¶ 260 (1980) (*Computer II Final Decision*), *recon.*, 84 FCC 2d 50 (1980) *(Reconsideration Order)*, *further recon.*, 88 FCC 2d 512 (1981) *(Further Reconsideration Order)*, *affirmed sub nom. Computer and Communications Industry Ass'n v. FCC*, 693 F.2d 198 (D.C. Cir. 1982), *cert. denied*, 461 U.S. 938 (1983). *See also In the Matter of American Information Technologies Corp., BellSouth, NYNEX; Interim Capitalization Plans for the Furnishing of Customer Premises Equipment and Enhanced Services (Centrex Sales Agent Order)*, 98 F.C.C.2d 943 (1984).

the Commission should adopt minimum thresholds for collocation and should not permit states to adopt rules that would undermine the federal standards.

A. The Commission Should Require ILECs to Permit Collocation of All Types of Equipment and Should Ensure that Appropriate Space Will be Made Available

CTSI agrees with the Commission's conclusion that ILECs should not be permitted to impede competing carriers from offering advanced services by imposing unnecessary restrictions on the type of equipment that competing carriers may collocate.[9] Accordingly, CLECs should be permitted to collocate virtually any type of telecommunications equipment used for voice and data communications, including equipment that contains switching functionality. For example, CLECs should be permitted to collocate Digital Subscriber Line Mutiplexers (DSLAMs) and remote access management equipment. CTSI believes that allowing collocation of equipment that performs both switching and other functions would encourage CLECs to use integrated equipment as a means to collocate equipment that otherwise would not be allowed in central offices. It is for this reason that the Commission should not distinguish between circuit or packet switching equipment for purposes of collocation. Any restrictions of collocation of switches would impose artificial constraints on design and manufacture of equipment that would result in inefficiencies and increased costs.

CTSI also agrees with the Commission's conclusion that if an ILEC chooses to establish an advanced services affiliate, the incumbent must allow CLECs to collocate equipment to the same extent as the incumbent allows its advanced services affiliate to collocate equipment.[10] This would

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9 *Section 706 NPRM*, ¶ 129.

10 *Section 706 NPRM*, ¶ 129.

be required for the ILEC to meet its existing obligation to provide collocation on nondiscriminatory terms and conditions.

In addition, the Commission should take serious measures to ensure that ILECs offer increased collocation options and that ILECs make space in their offices available for CLEC equipment. First, CTSI agrees with the Commission's conclusions that additional types of collocation, including cageless collocation should be made available for CLECs.[11] The more options available, the more competitors will be able to penetrate the local and advanced telecommunications markets. Second, the Commission must enact strict procedures to ensure that ILECs actually provide available space for CLEC collocation. Specifically, CTSI urges the Commission to require ILECs to permit CLECs seeking physical collocation at LEC premises to tour the premises.[12] This should be provided in addition to the detailed floor plans and should be provided any time an ILEC denies a request for physical collocation or offers unsuitable space. CTSI agrees with the Commission that state commissions will be better able to evaluate whether a refusal to allow physical collocation or the offer of unsuitable space is justified if CLECs can view the LEC premises and present their arguments to the state commission.[13]

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11 *Section 706 NPRM*, ¶ 137.

12 *Section 706 NPRM*, ¶ 146.

13 *Id.*

IV. The Commission Should Require ILECs to Provide Increased Access to Local Loops

CTSI agrees with the Commission's concern that the existing rules with regard to the unbundling of loops do not fully ensure that CLECs have adequate access to the "last mile," which is critical to ensure that CLECs are able to fully compete in the advanced services market.[14] It is for that reason that the Commission must establish additional national rules for local loops pursuant to Sections 201 and 251 of the 1996 Telecommunications Act in order to remove barriers to entry and permit additional CLECs to provide advanced services. Such adoption of uniform standards would further encourage the deployment of advanced services by increasing predictability and certainty. As with the collocation standards, the regulations the Commission adopts should be minimum standards that could be supplemented by the state commissions.

A. The Commission Should Require ILECs to Provide Conditioned Loops and Information Sufficient to Determine Whether Loops are Conditioned

Essential to the ability of CLECs to provide advanced services is the requirement that ILEC's must provide "conditioned" loops that are able to be used to provide xDSL services. Obviously, if the ILEC is able to avoid providing access to such loops, they will have little competition in the provision of xDSL services. Thus, ILECs should be required to provide loops that are free of bridge taps, load coils, and midspan repeaters, on request.

Similarly, CTSI agrees with the Commission's tentative conclusion that, as part of the rules governing Operational Support Systems ("OSS"), ILECs should be required to provide CLECs on

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[14] *Section 706 NPRM*, ¶ 151.

request with sufficient information about the loop to enable them to determine whether the loop is capable of supporting xDSL.[15] However, while this information would enable CLECs to determine the extent to which loops are suitable for use with any equipment or services that the CLEC may be planning to use or provide, this information should not be able to be used as a substitute for the provision of conditioned loops. CTSI urges the Commission to reject any ILEC claims that they lack sufficiently detailed or ready information concerning their loops.

B. The Commission Should Require Sub-Loop Unbundling

CTSI urges the Commission to adopt its proposal to extend loop unbundling requirements to sub-loop elements.[16] The Commission should require ILECs to provide access to feeder cable, portions of loops and remote terminals. In many situations, for example, if the loop is provisioned by means of a digital loop carrier system or where there is insufficient collocation space, sub-loop unbundling may be the only feasible way for a CLEC to access the loop in order to provide advanced services. Contrary to ILEC claims, sub-loop unbundling is technically feasible. The Commission should not permit ILECs to raise technical issues as a barrier to providing sub-loop unbundling. Moreover, in the event that existing pedestals or remote terminals do not have sufficient space to accommodate all requests for unbundled access, the Commission should require ILECs to construct, or allow the CLEC to construct, an adjacent remote terminal. Providing for sub-loop unbundling would further the competitive goals of the 1996 Telecommunications Act.

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15 *Section 706 NPRM*, ¶ 157.

16 *Section 706 NPRM*, ¶ 173.

V. The Commission Should Not Grant Additional Relief to ILECs

CTSI does not support the Commission's suggestion that it should grant Section 251(c) relief to ILECs that offer advanced services on an integrated basis.[17] First, the Commission does not have the authority under Section 10 of the 1996 Telecommunications Act to forbear from application of Section 251(c). Moreover, such an exception from Section 251(c) would directly conflict with the Commission's determinations in its Order that ILEC provision of advanced services, except through its affiliate proposal, would be fully subject to Section 251.[18]

Second, any such grant of relief would inhibit competition. Advanced services are most likely to reach all Americans if the ILECs are subject to unbundling obligations to permit additional competitors to provide service. Absent the essential unbundling obligations, ILECs would not have the incentive through competition to invest in the provision of advanced services.

VI. ILECs Are Obligated to Resell Advanced Services

CTSI agrees with the Commission's tentative conclusion that ILECs must establish a wholesale rate and offer for resale, any advanced services it generally offers to subscribers who are not telecommunications carriers. Section 251(c)(4) imposes the duty to ILECs to offer for resale at wholesale rates, "any telecommunications services that the carrier provides at retail to subscribers

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[17] *Section 706 NPRM*, ¶ 180.

[18] *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, Memorandum Opinion and Order, CC Docket No. 98-147, FCC 98-188, released August 7, 1998.

who are not telecommunications carriers."[19] CTSI agrees with the Commission's conclusion that advanced telecommunications services fall within the core category of retail services that both Congress and the Commission anticipated would be available for resale with such discounts.[20] Accordingly, the Commission should require that advanced telecommunications services marketed by ILECs generally to residential users, business users, or ISPs should be deemed subject to the resale obligations of Section 251(c)(4).

VII. The Commission Should Not Grant InterLATA Relief to the BOCs

CTSI strongly objects to any modification of LATA boundaries that would permit BOCs interLATA entry prior to compliance with § 271 of the 1996 Act. The current state of the local markets is far from fully competitive. Through the barriers they have placed in preventing CLECs access to collocation and unbundled network elements, BOCs are largely responsible for the lack of choice consumers have today in their local telephone providers. The Commission must not reward this behavior by permitting modifications in LATA boundaries as a means to permit BOC interLATA entry. Such modifications would be in plain violation of Section 271 of the Act and would diminish BOC incentives to open up the local exchange to competition.

VIII. CONCLUSION

CTSI applauds the Commission's efforts to ensure that advanced telecommunications services are available to all Americans and its stated desire to use this rulemaking as a method for

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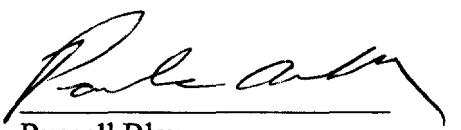
[19] 47 U.S.C. § 251(c)(4).

[20] *Section 706 NPRM*, ¶ 189

encouraging competition and investment in competitive services. The Commission should thus be wary of providing the ILECs with opportunities to evade their responsibilities to open their markets to competition, and should carefully craft any proposal permitting ILECs to provide advanced services through a separate affiliate that is not subject to Section 251(c). The Commission must ensure that any separate affiliate proposal would not permit the ILECs to favor this affiliate and inhibit competition.

Moreover, the Commission should use this opportunity to require the ILECs to further open their markets to competition. As CTSI expressed above, the Commission should adopt additional collocation and loop unbundling requirements that would permit CLECs further access to the elements essential to the provision of local exchange and advanced telecommunications services.

Respectfully submitted,



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September 25, 1998

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CERTIFICATE OF SERVICE

I, Ivonne Diaz, hereby certify that on this 25th day of September 1998, copies of the foregoing Comments of KMC Telecom was hand delivered to the parties listed below.

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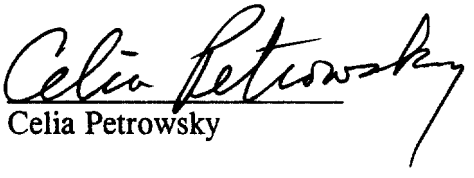

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